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20 *Attorneys for Defendants C. R. Bard, Inc. and*  
21 *Bard Peripheral Vascular, Inc.*

22 IN THE UNITED STATES DISTRICT COURT  
23 FOR THE DISTRICT OF ARIZONA

24 IN RE: Bard IVC Filters Products Liability  
25 Litigation,

No. 2:15-MD-02641-DGC

**JOINT MOTION TO EXTEND TIME  
TO FILE MOTION TO SEAL  
DOCUMENTS FILED BY  
PLAINTIFFS IN RESPONSE TO  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

The parties submit this joint motion to extend time for Bard to file a motion to seal documents lodged under seal by Plaintiffs in response to Bard's Motion for Summary Judgment in the Hyde, Jones, and Mulkey cases (*See*, Dkt 7951). On October 10, 2017, Plaintiffs notified Bard of their intent to amend their Motion to Seal and Notice of Lodgment and file an errata as to the documents lodged under seal in response to those motions. Plaintiffs intend to file the Amendment and errata on October 13, 2017.

The parties stipulate to extend the time for Defendants to file a motion to seal the documents lodged by Plaintiffs until October 27, 2017, or fourteen (14) days after Plaintiffs file the Amendment and Errata.

RESPECTFULLY SUBMITTED this 13th day of October, 2017.

GALLAGHER & KENNEDY, P.A.

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By: s/ Ramon Rossi Lopez

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 13<sup>th</sup> day of October 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing:

s/Richard B. North, Jr.  
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